## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

## RECOVERY LIMITED PARTNERSHIP, Plaintiff,

v. Civil Action No.: 2:87-cv-00363

UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc.,
Defendant.

## STATUS REPORT TO COURT AND NOTICE OF PROPOSED SALVAGE

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the SS CENTRAL AMERICA ("SSCA"). Plaintiff has previously submitted twenty-seven reports, two in Civil Action No. 2:14-cv-160, and twenty-five in Civil Action No. 2:87-cv-363. *See* D.E. # 21 and 90 (No. 2:14-cv-160); D.E. # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292, 293, 294, 295, and 303 (No. 2:87-cv-363).

The Trustee, John Pidcock, together with RLP's salvage adviser Craig T. Mullen, have completed their evaluation of potential salvors for salvage of the wreck of the SS CENTRAL AMERICA in 2024. Based on a various factors, Eclipse Group, Inc., headquartered in Annapolis, Maryland was selected as the preferred salvor. Subject to court approval, salvage operations could commence as soon as May 2024.

The Trustee is prepared to promptly submit the proposed salvage plan and agreement for the Court to review and determine whether to approve it. Because they contain confidential proprietary and financial information, the Trustee requests leave to file such information under seal. To assure vessel and equipment availability, it is respectfully requested that the Court make its determination regarding the proposed 2024 salvage by February 29, 2024.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. Central America lies with this Court. He understands his obligation to notify this Court regarding the proposed 2024 salvage and seeks advance approval from the Court before any such salvage is performed in accordance with the Order entered January 11, 2019. D.E. # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report and request.

This 15th day of December, 2023.

/s/ James L. Chapman, IV

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Counsel for Recovery Limited Partnership

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of December, 2023, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)

Counsel for Recovery Limited Partnership

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